

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re Bayou Hedge Fund Litigation

:
: 06 MDL 1755 (CM) (MDF)
:

-----X
This Document Relates To:
Broad-Bussel Family Limited Partnership, et al.

:
: **NOTICE OF MOTION**
:

v.

: 06 Civ. 3026 (CM) (MDF)
:

Bayou Group, LLC, et al.,

:
: **Electronically Filed**
:-----X

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Doreen Klein, Esq., sworn to April 27, 2006, and upon the accompanying Memorandum of Law in Support of Motion to Stay the Proceedings, and all other papers filed and to be filed in this proceeding, defendant James G. Marquez moves before the Honorable Colleen McMahon, United States District Court, Southern District of New York, 300 Quarropas Street, White Plains, New York, on a date to be determined by this Court, for an order (i) granting a stay of the proceedings against James G. Marquez pending final determination by the Office of the United States Attorney for the Southern District of New York regarding its criminal investigation of Mr. Marquez; and (ii) for such other and further relief as is just and proper.

PLEASE TAKE FURTHER NOTICE, that answering papers are to be served two weeks after receipt of the moving papers, and reply papers are to be served five business days after receipt of the answering papers.

Dated: Stamford, Connecticut
April 27, 2006

DAY, BERRY & HOWARD LLP

By: /s/ Doreen Klein
Thomas D. Goldberg (TG 7251)
Stanley A. Twardy, Jr. (ST 9589)
Doreen Klein (DK 4982)

One Canterbury Green
Stamford, Connecticut 06901
tel. (203) 977-7300
fax. (203) 977-7301

and

875 Third Avenue
New York, New York 10022
tel. (212) 829-3600
fax. (212) 829-3601

Attorneys for Defendant James G. Marquez

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2006, a copy of the accompanying Notice of Motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Doreen Klein
Doreen Klein (DK 4982)